

# EXHIBIT 6

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

SANDHILLS GLOBAL, INC.,

Civil Action No. 3:19-cv-20669

Plaintiff,

v.

LAWRENCE GARAFOLA, individual, and  
FACTS TECHNOLOGY LLC, a New Jersey  
limited liability company,

Defendants.

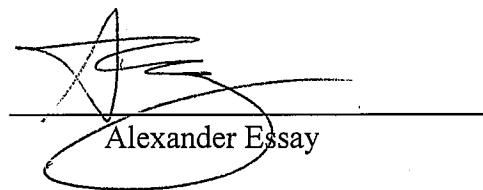
I, Alexander Essay, hereby certifies as follows:

1. I submit this Declaration in support of Plaintiff's Motion for Attorneys' Fees and Costs.
2. I am the Assistant General Counsel at Sandhills Global, Inc. As such, I am familiar with the matters at issue in this motion.
3. In connection with the preliminary injunction proceeding in the matter, the Court held in-person evidentiary hearings in New Jersey on February 6 and 21, 2020.
4. Evan Welch (Sandhills Director of New Product Sales) and I traveled to New Jersey to attend the hearings on February 6<sup>th</sup> and 21<sup>st</sup>.
5. We flew via commercial airline and stayed at local New Jersey hotels.
6. As part of that, Sandhills incurred and paid a total of \$2,716.39 in travel expenses broken down as follows:
  - (i) For me, \$702.53 to attend the February 6<sup>th</sup> hearing and \$732.59 to attend the February 21<sup>st</sup> hearing; and

(ii) For Mr. Welch, \$606.61 to attend the February 6<sup>th</sup> hearing and \$674.77 to attend the February 21<sup>st</sup> hearing.

7. Therefore, Sandhills seeks reimbursement of \$2,716.39 incurred in connection with successfully enforcing Lawrence Garafola's restrictive covenant agreements he entered into with Sandhills.

I hereby declare under penalty of perjury, that the foregoing statements made by me are true and correct.



Alexander Essay

DATED: October 6, 2020